

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MICHAEL HACKLEY ARCHITECTS,
P.C. AND MICHAEL HACKLEY,

Plaintiffs,

V.

LVLX, INC., JOHN LEE,
COMMERCIAL FINISH GROUP,
INC. AND JEFFREY WAY,

Defendants.

**DEFENDANT'S RULE 26(a)(2) DISCLOSURES RE: EXPERTS
AND MOTION TO EXTEND TIME TO DISCLOSE OPINION OF EXPERTS**

Commercial Finish Group, Inc., one of the Defendants, by Howard G. Goldberg and Goldberg, Pike & Besche, P.C., its attorneys, hereby submits its Rule 26(a)(2) Disclosures re: Experts pursuant to this Court's Scheduling Order dated December 13, 2002, and requests an extension of time for filing the opinion of experts and for cause says:

1. Commercial Finish Group, Inc. reserves the right to call Richard B. Cook, FAIA, as an expert in this case. The resume of Mr. Cook is attached hereto and incorporated herein as *Exhibit 1*. Mr. Cook may testify regarding copyright issues. However, Plaintiffs have not produced any documents in response to this Defendant's Request for Documents, which has been outstanding since January 10, 2003, and which Defendant's expert needs in order to formulate his opinions. Plaintiffs have promised to provide those documents by March 14, 2003.

2. Therefore, Defendant requests an additional 30 days in which to get the documents from Plaintiffs and have its expert review the documents and formulate his opinion with respect thereto.

3. In addition, Plaintiffs have not provided any damage information in response to this Defendant's damage interrogatory. For that reason, Defendant reserves the right to call an expert on damages.

4. Defendant reserves the right to supplement its Rule 26(a)(2) Disclosures re: Experts.

WHEREFORE, Defendant Commercial Finish Group, Inc. respectfully requests that this Court grant its Motion to Extend Time by 30 days after Plaintiffs provide information previously requested in discovery by this Defendant for Defendant's expert or experts to submit opinions in this case.

Respectfully submitted,

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Attorneys for Commercial Finish Group,
Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 12th day of March, 2003, a copy of Defendant's Rule 26(a)(2) Disclosures re: Experts and Motion to Extend Time to Disclose Opinion of Experts, and proposed Order, was served electronically and via facsimile, and mailed, postage prepaid, to: Royal W. Craig, Law Offices of Royal W. Craig, 10 North Calvert Street, Suite 153, Baltimore, Maryland 21202, attorney for Plaintiffs and Gary M. Anderson, Esquire, P.O. Box 975, Laurel, Maryland 20707, counsel for Defendants LVLX, Inc., John Lee and Jeffrey Way.

Howard G. Goldberg, Esquire

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